

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

CONG. CASA GRANDE,

*

Plaintiff,

*

v.

*

Case No.: 1:24-cv-7752

JOSEPH LEFKOWITZ, et al,

*

Defendants.

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CONG. CASA GRANDE FIRST REQUESTS FOR ADMISSION TO DEFENDANT JNL

ARIZONA PROPERTIES LLC

Plaintiff, Cong. Casa Grande (“**Casa Grande**”), pursuant to Rule 36 of the Federal Rules of Civil Procedure (the “**Federal Rules**”), and Rules 26.2, 26.3, 26.4, and 26.5 of the United States District Court for the Eastern District of New York Local Rules (the “**Local Rules**”), by and through its undersigned counsel, hereby submits these requests for production of documents (each a “**Request**” and collectively, the “**Requests**”) addressed to Defendant, JNL Arizona Properties, LLC (“**JNL**” or “**Defendant**”). Defendant shall respond to each Request within the time prescribed by the Federal Rules, in accordance with the Instructions and Definitions set forth hereinafter.

INSTRUCTIONS

1. In responding to the following Requests, please set forth verbatim the request for admission to which you are responding and then set forth your written response thereto.
2. If an objection is made, the reasons for the objection shall be stated.
3. The answers shall specifically admit, deny, or set forth in detail the reason(s) why you cannot truthfully admit or deny the matter.

4. When good faith requires that you qualify an answer or deny only a part of the matter for which an admission is requested, you shall specify so much of it as is true and qualify or deny the remainder.

5. You may not give lack of information or knowledge as a reason for failure to admit or deny unless you state that you have made reasonable inquiry and that the information known or readily obtainable by you is insufficient to enable you to admit or deny.

6. The following Requests shall be continuing to the fullest extent permitted under the applicable provisions of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Eastern District of New York.

DEFINITIONS

7. “You” and “your” shall mean JNL and any person or entity acting on behalf of JNL and, as to all, past or present.

8. “Plaintiff” shall mean Cong. Casa Grande and any of its members, principals or investors, and any of its predecessors, successors, parent corporations, subsidiaries, divisions and affiliates, however organized, and all directors, officers, employees, agents, consultants, accountants, representatives, agents and legal counsel thereof and any person or entity acting on behalf of Purchaser, past or present.

9. “Person” shall refer to natural persons as well as entities, companies, associations or any similar organization.

10. As used herein, the term “communication” means any oral or written statement, dialogue, representation, discussion or conversation, regardless of the medium in which it occurred.

11. As used herein, the term “document” shall include, without limitation, original writings and recordings of any nature whatsoever, and all non-identical copies thereof (whether different from the original because of notes made on such copy or otherwise) in the possession, custody or

control of defendant or its attorneys, regardless of where the documents are located. Such writings or recordings include, but are not limited to, contracts, agreements, records, invoices, receipts, work orders, memoranda, reports, analyses, returns, summaries, studies, checks, charts, statistics, calculations, drawings, specifications, advertisements, tape or other recordings, letters, correspondence (interoffice or otherwise), communications, films, videotapes, data stored on a computer or recorded by a computer, data stored or recorded in magnetic form, computer printouts, calendar or diary entries, time management logs, notes, expense reports, travel reports, minutes of directors, officers or committee meetings, logs, working papers, agendas, bulletins, notices, announcements, instructions, manuals, pamphlets, books, brochures, photographs, photographic slides, transparencies, schedules, telegrams, telexes, facsimiles, and teletypes, and any draft of the foregoing. A draft or non-identical copy is a separate document within the meaning of this term.

12. “JNL” shall mean JNL Arizona Properties LLC which has its principal place of business located at 1590 E. Racine Drive, Casa Grande, Arizona 85122.

13. “Mikvah” or “Mikvahs” shall mean each of the Jewish ritual baths located at (1) 1645 E. Silver Reef Dr, Casa Grande AR 85122, and (2) 913 E 8TH ST, Casa Grande, AZ 85122.

14. “Plaintiff’s bank account” shall mean the Bank of America Checking Account belonging to Plaintiff with an account number that ends with digits “0192.”

15. Board of Directors. “Board of Directors” shall mean the Cong. Casa Grande Board of Directors.

REQUESTS FOR ADMISSION

1. Admit that after securing the trust and confidence of the Congregation's Board of Directors, Joseph Lefkowitz began making unauthorized transfers from the Congregation to bank accounts affiliated with JNL.

RESPONSE:

2. Admit that Joseph Lefkowitz is the sole member of JNL, and that Joseph Lefkowitz controls and operates JNL's business activities.

RESPONSE:

3. Admit that you are and/or Joseph Lefkowitz is in possession of funds belonging to the Plaintiff.

RESPONSE:

4. Admit that you and/or Joseph Lefkowitz made deposits, transfers, checks, and/or withdrawals from Plaintiff's Bank of America Checking Account to you, your bank accounts, on your behalf, to Joseph Lefkowitz, to Joseph Lefkowitz's bank accounts, and/or on behalf of Joseph Lefkowitz.

RESPONSE:

5. Admit that you and/or Joseph Lefkowitz used deposits, transfers, checks, and/or withdrawals from Plaintiff's Bank of America Checking Account to purchase properties for and/or on behalf of you and/or Joseph Lefkowitz.

RESPONSE:

Dated: Pomona, New York
_____ April 30, 2025

Respectfully submitted,

/s/ Elchanan “Elliott” Engel
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